

RECEIVED

JUN 10 1993

DIVISION OF  
OIL GAS & MINING

**UNOCAL** 76

Unocal Corporate Environmental  
Remediation & Technology  
Unocal Corporation  
715 Horizon Drive, Suite 485  
Grand Junction, Colorado 81506  
Telephone (303) 245-7766  
FAX (303) 242-7165

M/037/022

June 8, 1993

Administrator  
Industrial Commission of Utah  
UOSH  
160 East 300 So. 3rd Floor  
P.O. Box 146650  
Salt Lake City, Utah 84114-6650

Dear Sir:

Pursuant to a telephone conversation with Mr. Gary Padley of your staff, I am enclosing an excerpt from Molycorp's vanadium tailings relocation proposal to the Division of Radiation Control, Department of Environmental Quality entitled RELOCATION PLAN AND PROCEDURES.

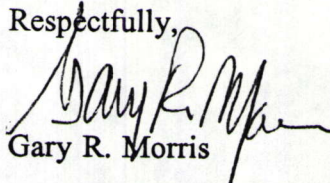
The Director of the Division of Radiation Control, Mr. Larry Anderson, asked Molycorp, a subsidiary of Union Oil Company of California, to submit a formal proposal to relocate the tailings to a local underground mine situated on patented claims in San Juan County, Utah. The excerpt from the proposal briefly describes how the tailings are to be relocated underground.

You will note that because low level waste is being stored underground, MSHA claims no jurisdiction for safety of this operation. MSHA has jurisdiction only when ore is extracted/produced from a mine; not when material is placed back into a mine (copy of MSHA letter attached). Nevertheless, you will note that we are requiring the underground contractor to comply with MSHA regulations.

When MSHA indicated they didn't have jurisdiction, I contacted the Industrial Commission at the suggestion of Holland Shepherd, a Reclamation Specialist with the Division of Oil, Gas and Mining.

If UOSH has specific worker safety requirements and jurisdiction for any element of this project, please advise.

Respectfully,

  
Gary R. Morris

File No. UT-2001-240.010.000

GRM/cf  
Enc.

cc: R.F. Clark w/o attachment  
Larry Anderson - DEQ w/o attachment  
D.R. Shoemaker w/o attachment  
Holland Shepherd - DNR-DOGM w/o attachment

c:\files\wp51\uos.h.608